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February 29, 2000

Ms. Andrea Wilkens
Reports Analyst
Reports Analysis Division
Federal Elections Commission
999 E Street NW
Washington, DC 20463

Identification Number: C00226472
Reference: Mid-year Report (1/1/99-6/30/99)
Year End report (7/1/99-12/31/99)

Dear Ms. Wilkens:

In response to your letter dated February 16, 2000, please accept the following as an explanation of ARPAC's administrative expenses for ARPAC's Mid-Year Report (1/1/99-6/30/99) and Year-End Report (7/1/99-12/31/99).

A) Administrative Expenses

During this reporting period the administrative expenses incurred by ARPAC for the operating of the political action committee were non-existent. There is not an individual paid a salary that handles the day to day operation of ARPAC. Additionally, ARPAC does not have offices that require the payment of rent, or the payment of utilities or telephone service or office equipment.

B) Legal and Accounting Services

It is clearly stated by the Federal Elections Commission, a partnership may offer legal and accounting services to its political action committee provided that the following are met: (a) the services to candidate committees and other nonparty committees are provided only for the purpose of helping them comply with federal election campaign law; (b) the services provided to political party committees do not directly further the election of any specific candidates for federal office; and (c) the individual who performs the service is a regular employee of the partnership (a partner is considered a regular employee of the partnership). 11 CFR 100.7(b)(13) and (14).

In ARPAC's instance, myself, B. Jeffrey Brooks, a partner in Adams and Reese, provides all legal services to ARPAC to keep it in compliance with federal election


and campaign law and Paul Lassalle, Chief Financial Officer and an employee of Adams and Reese LLP provides the accounting services to ARPAC to keep it in compliance with federal election and campaign law. Thus, these services are not a paid administrative expense.

Finally, please take note of the ARPAC's electronic amendment to our Mid-Year Report (1/1/99 6/30/99) that addresses the designation of a disbursement on Schedule B, Itemized Disbursements. The disbursement to Donelon for Senate was marked as "Other" and will be designated in our electronic amendment as "General" for the Donelon for Senate Debt Retirement.

I would like to thank you in advance for your consideration of this matter and if you have any questions please feel free to contact me at 202-737-3294.

With best wishes,

Sincerely,


B. Jeffrey Brooks
ADAMS AND REESE LLP

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE -
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